

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EARTHA AUGUSTIN,

Plaintiff,

-vs-

ENLARGED CITY SCHOOL DISTRICT OF
NEWBURGH, et. al, etc.,

Defendants.

Civil Action No. 07 Civ 5709 (WCC)

INITIAL DISCLOSURES BY
DEFENDANTS

Defendants, by their attorneys, Shaw, Perelson, May & Lambert, LLP, as and for their Initial Disclosures pursuant to Fed. R. Civ. P. 26 (a) (1) hereby provide the following information in the order provided by Rule 26 (a) (1):

A. Individuals likely to have discoverable information concerning or establishing the lawful non-discriminatory basis for the actions of the defendants of which the plaintiff complains¹:

1. Plaintiff
2. Joan Goudy-Crosson
3. Dr. Annette Saturnelli
4. Dr. Roberto Calderin, NWS Principal
5. Lois Childer, Teacher and Mentor
6. Maritza Ramos, NWA Asst. Principal
7. Margaret Burpee, Director of Humanities
8. Sonia Miranda, Parent

¹ Where no address is provided, unless “address currently unknown” is stated, except for the plaintiff, the address is care of the defendant School District.

9. W. John Knight, former Asst. Superintendent for Human Resources
10. Mary Ellen Leimer, Asst. Superintendent for Human Resources
11. Essence Fox, Student
12. Patricia A. Tomkins, CBP secretary
13. Phillip Cordello, NTA Pres.
14. Mrs. Angela Sartori, NTA delegate, New Windsor School
15. David Owens, CBP security monitor
16. Yvette Norat, School Social Worker
17. Herbert Lamb, Heritage Jr H. S. Teacher
18. Patricia O'Connor, Deputy Supt.
19. Nancy Colon, HOHMS Principal
20. Anthony Grice, long term substitute teacher for plaintiff
21. Guy Delisfort, school psychologist
22. Mrs. Scott, Parent
23. Mrs. D. Bannan, NWS Assistant Principal
24. Heidi Tannenbaum, Teaching Ass't
25. Toie Calhoun, Teacher Aide
26. Dr, Michele R. Winchester-Vega
339 Blooming Grove Tpk
New Windsor, NY 12553
27. Mary Lou Botsford, Clerk of the Board
28. Oneika Ellis, Teacher
29. Rafael Perez,, School Counselor

The defendants reserve their right to supplement this list.

B. Documents, etc. in possession of defendants that defendants may use to support their claims or defenses.

1. Documents in plaintiff's personnel file.

2. Documents in files maintained by defendant school district's Human Resources department on the plaintiff.

3. Documents in files maintained by the principals under whom the plaintiff served during her employment by the defendant school district.

4. Records concerning tenure granted to other personnel who were from the Caribbean.

5. Deposition testimony taken of plaintiff Augustin in Simpson v. Newburgh ECSD .

6. Deposition testimony taken of Oneika Ellis in Simpson v. Newburgh ECSD .

The defendants reserve their right to supplement this list.

C. Any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of the judgment, etc.

See attached.

Dated: November 6, 2007
Highland, New York

Shaw, Perelson, May & Lambert, LLP
Attorneys for Defendants

By: _____ /s
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